

# Cooperative Extension

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## Department of Animal Sciences

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May 9, 2005

National Organic Standards Board  
c/o Arthur Neal  
Room 4008 – South Building  
1400 and Independence Avenue SW  
Washington, DC 20250-0001

Dear Mr. Neal:

I am writing in response to the NOSB "Guidance for Interpretation of section 205.239(a)(2) of the National Organic Program, published for public comment on March 22". As a scientist and PhD nutritionists with over 7 years of experience in organic milk production, I struggle with the minimum numerical requirement of 30% dry matter intake (DMI) for not less than 120 days proposed in the new guidance statement on the access to pasture rule. Currently, there is no data indicating a health advantage for cattle housed under these numerical requirements. In addition, rumen health depends on the balance between concentrates and total forage in a diet 365 days a year regardless of the moisture content of the diet. I also challenge the ability to accurately measure forage intake to meet the proposed requirements. Consequently, it is my professional opinion that the pasturing requirements of the proposed guidance statement are impossible to monitor and regulate.

Sincerely,



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